

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA, : CR. NO. 88-35-E
 :
 : AFFIDAVIT RE:
 -v- : (I) ITEMS BEING HELD AS
 : EVIDENCE, RETURNED OR TO
 DAVID MADAY, : BE RETURNED TO DEFENDANT
 : (II) RESPONSE TO THE SPECIFIC
 Defendant. : ALLEGATIONS IN DEFENDANT'S
 : MOTION TO SUPPRESS

STATE OF NEW YORK)
COUNTY OF ERIE) SS:
CITY OF BUFFALO)

Martin J. Littlefield, being duly sworn, deposes and says:

1. I am the Assistant United States Attorney assigned to oversee the prosecution of the above-captioned matter.

I. GOVERNMENT'S STATEMENT REGARDING ITEMS BEING HELD AS EVIDENCE, ITEMS ALREADY RETURNED TO DEFENDANT OR ITEMS TO BE RETURNED TO DEFENDANT

2. Attached hereto and marked Exhibit A is the Search Warrant and underlying Affidavit of Postal Inspector Ralph B. Haring; also attached and marked Exhibit B is the Return on the Search Warrant filed by Postal Inspector Ronald Snyder before Magistrate Maxwell on June 22, 1988.

3. Also attached to this Affidavit and marked Exhibit C is the same information as contained in Exhibit B (the Return), however, I have further broken down the categories into the following:

- a) Description of Items Continuing to be Held as Evidence
- b) Description of Items Already Returned to Defendant

c) Description of Items Intended to Be Returned to Defendant.

4. As to the items which the Government wishes to continue to hold as evidence, the Government submits the following information to the Court:

- I. BAR ROOM: (a) SONY television and video cassette recorder (VCR) -- these items tend to prove that the defendant had the capacity to review not only the video cassette which is the subject of the Indictment but also all the other video cassettes which are being held as evidence.
- (b) 2 Video cassettes (Heageats #3 8/85 and Heageats XXX #1 8/85: These contain adult pornography, the reasons for the continuing hold are set out in the Memorandum of Law filed simultaneous with this Affidavit.
- (c) Various substances and drug paraphernalia -- these items are per se contraband and were seized while in "plain view". The substances field-tested positive as being controlled substances (marijuana and cocaine).

II. DINING ROOM:

19 of the 20 video cassettes being held involve various homosexual and self-abuse activity of young men. The last video tape is the video tape which is the subject of this Indictment (Pissing Lolita).

III. UPSTAIRS OFFICE - TYPIST TABLE:

This typewriter has been identified as being used by the defendant to mail correspondence to the Far Eastern Trading Company (the undercover postal organization).

IV. UPSTAIRS OFFICE - AREA B - CLOSET:

The film projector is being held to show defendant's capacity to view the various films seized, as more fully set out below.

V. UPSTAIRS OFFICE - AREA A - CLOSET E-Z:

Film viewer - being held for the same reason as the film projector.

VI. UPSTAIRS OFFICE - AREA C, E-Z FILE CABINET:

Various manila folders and envelopes: The defendant was a member of a legitimate child care group called "Be a Friend" and "Brothers/Sisters". These file folders contain information on the various programs and on particular children who were "Friends" with the defendant. (In another area, various notes were recovered which show the defendant noting whether he had sex or viewed the sexual organs of some of the children from "Be a Friend".)

VII. UPSTAIRS OFFICE - AREA E - DESK:

(a) Nine of the ten folders being held contain various information and other correspondence dealing with various children and "Be a Friend" materials. The other folder is marked "NAMBLA" and contains information about the national group which promotes homosexual acts between men and boys. Also found in this folder is the actual catalog from Far Eastern Trading Company (undercover Postal organization) from which the defendant ordered the video which is the subject for the Indictment. Also included in this folder is a copy of the actual order which the defendant placed with the Far Eastern Trading Company.

(b) The "Sex Orgy" Register contains handwritten notes about named male individuals, their age (14-23 years) and the sexual activity in which they engaged.

(c) Four audio cassette tapes (out of 14 originally seized): These tapes consist of telephone recordings of David Maday with other persons. During the course of these conversations, Maday is heard either

negotiating the price of obtaining children, acknowledging his sexual desires for children or his sexual proclivities in general toward children.

VIII. UPSTAIRS OFFICE - AREA E - SHELF ON WALL:

Nothing intended to be held as evidence.

IX. UPSTAIRS OFFICE - AREA D-Z, BOTTOM OF GUN CABINET:

This area is where most of the child pornography magazines, films, order blanks and notebooks were found, all of which related to children and/or young adults involved in sexual activity; included were some "homemade" pictures which can be correlated to the lists kept by the defendant about "friends" (Be-a-Friend Organization) which lists noted whether he had seen the sexual organs of and/or had sex with the children (all young males). Also of interest is a series of newspaper articles which the defendant had placed in a three-ring notebook (each page with plastic covers). Those newspaper articles either dealt with sexual child abuse, sex with children, prosecutions of various pedophiles, etc.

X. GUEST BEDROOM:

Nothing intended to be held as evidence.

XI. MASTER BEDROOM AND WALK-IN CLOSET:

Eleven magazines: All these magazines involve explicit sexual activity including child pornography,

hard-core adult pornography (including both homosexual and heterosexual activity). There is also a catalog of sexual paraphernalia and a cartoon book dealing with hard-core sexual activity.

5. It is submitted to the Court that all of the items (except the drug-related items) being held as evidence provide direct or circumstantial evidence of the defendant's intentional involvement with the crime alleged in the Indictment.

6. As the Court is aware, the Government must prove that the defendant used the mails to receive the prohibited sexual materials and that he did so knowingly. The defendant's possession of the child pornography would directly show the defendant's sexual preferences in regards to child pornography, while the adult pornography would circumstantially show such tendencies. Also, the defendant's involvement in a child welfare group like "Be a Friend" coupled with his notes about sexual involvement with some of his "Friends" (all children) also shows circumstantially the defendant's tendencies. The Government submits that this is evidence tending to show the defendant's knowing and intentional involvement in the alleged criminal activity. Also, under Rule 404(b) of the Federal Rules of Evidence, this evidence would be proof of the defendant's motive, opportunity, intent, preparation, plan, knowledge, identity and/or absence of mistake or accident. (See the Government's Memorandum of Law for a fuller argument and case citation.)

7. Also, the same evidence referred to in the preceding paragraph would be needed by the Government to rebut any entrapment claim by the defendant.

8. As to any First Amendment rights of the defendant to possess adult pornography in his home, under Stanley v. Georgia, 394 U.S. 557 (1969), the Government is prepared to return all of the adult pornography once the disposition of this Indictment is final.

II. GOVERNMENT'S RESPONSE TO THE SPECIFIC ALLEGATIONS
IN THE DEFENDANT'S MOTION TO SUPPRESS DATED
APRIL 7, 1988

9. This section of the Affidavit shall attempt to respond to some of the allegations contained in the Affidavit of attorney Mark J. Mahoney, which was filed contemporaneous with the Motion to Suppress, dated April 7, 1988.

10. At the outset, it should be noted that all of the items that have been returned were video-tape recordings which upon review clearly did not contain any sexual activity. However, the review could not be done at the house of the defendant since there were approximately 37 video tapes seized, 16 8mm films seized and 14 audio tape cassettes seized. Obviously, the review of these films, videos and audio tapes took considerable time.

11. Also, all of the other items to be returned (including non-sexual photographs, correspondence, etc.) were originally seized since there appeared to be a direct correlation between this correspondence and other correspondence the defendant had

relative to sexual activity involved in the "Be a Friend" child welfare program. These various pieces of correspondence, photographs and notes were reviewed to determine whether there were any particular child victims which could be identified.

12. The Government states affirmatively the following:

- a) The search was conducted pursuant to the Search Warrant of Magistrate Edmund F. Maxwell.
- b) The scope of the search was within the parameters of the Warrant authorized by Magistrate Maxwell.
- c) The Search Warrant was not overly broad.
- d) There was ample probable cause set out in the Affidavit of Postal Inspector Ralph B. Harding for the Magistrate to issue this Search Warrant.
- e) The investigators conducting the search were entitled to rely upon the Search Warrant issued by the Magistrate even if there were defects in the Warrant.

13. Specific responses to allegations in the Mahoney Affidavit:

- a) Mahoney, ¶5 & 6 assert that Inspector Harding failed to provide a basis for his belief "that a wide variety of property would be located at the premises". The Government denies this allegation. Inspector Harding's Affidavit stated that the defendant engaged in correspondence with an undercover Postal inspector in 1984 wherein the defendant indicated his interest in child pornography (Harding Affidavit ¶6); that in 1984, the United States Customs Service interdicted six separate international mailings which were addressed to Mr. Maday all of which contained either child pornography or advertising depicting child pornography (Harding Affidavit ¶7); that in 1986-87, the defendant actually ordered the child pornography video which is the subject of the Indictment (Harding, ¶s 8-17 and 19). Furthermore, Inspector Harding set out his training and experience relative to child pornography and relative to those persons who possess and trade in child pornography (Harding Affidavit, ¶1 and ¶18). As a result of that training and experience, Inspector Harding concludes at paragraph 18 of his Affidavit:

. . . Child pornographers and pedophiles almost always maintain and possess their material

(pictures, films, video tapes, magazines, negatives, photographs, correspondence, mailing lists, books, tape recordings, etc.) in their homes or other nearby locations that is secure and concealed but immediately available and accessible to them. Furthermore, the collection of child pornography and other sexually explicit material maintained by these individuals is permanent, and although they may trade certain items for the purpose of expanding their collections, they will never willingly dispose of the entire collection. This behavior has been documented by other Postal inspectors and by other law enforcement officers involved in the investigation of child pornography throughout this county. Based upon my training and personal experience in child pornography investigations and the letters and materials sent by David C. Maday, David C. Maday fits the profile of a child pornographer and a pedophile.

It must be noted that the Mahoney Affidavit does not allege that Inspector Harding made any false statements nor does Mahoney even allege that Inspector Harding made any statements that were not founded in fact. Therefore, Harding's experiential conclusions were properly before the Magistrate as to what other materials and property might probably be found and subject to seizure.

- b) Mahoney, ¶7 asserts that the Search Warrant could not allow the search for "property which is not only unlawful to possess but which is beyond the reach of the Government power to search and seize, to wit: "other sexually explicit material". As will be

argued in the Memorandum of Law submitted to the Court by the Government, the "other sexually explicit materials" were seized because they are "evidence of a crime" albeit circumstantial evidence. The seizure of these other sexually explicit materials relate to the defendant's sexual proclivities and thus go directly to the defendant's knowing possession of and participation in criminal activity and specifically his violation of 18 U.S.C. §2252.

- c) Mahoney, ¶13 essentially alleges that certain materials which were seized by Customs officials in 1984 were not proper to place in the Affidavit of Inspector Harding. It will be argued in the Government's Memorandum that it is entirely proper to include such materials. As noted in Paragraph 7 of Inspector Harding's Affidavit, there were six seizures by the United States Customs of magazines or advertising depicting "children in sexually explicit poses". All of those seizures were addressed to the defendant at his home at 5 Brittany Lane in Buffalo, New York. The Magistrate would be entitled to conclude that the seizure of six such child pornography related materials within a single year is relevant information in the "totality of circumstances" for determining probable cause.

d) Mahoney, ¶16 & 17 incorrectly claim that Inspector Harding's Affidavit "failed to include as an exhibit the actual brochure manufactured by the Government and mailed to Mr. Maday and from which he [Maday] is alleged to have placed an order". Mahoney then alleges that this brochure contained a "bold printed warning" that the catalog does not include depictions of any persons under the age of 18. Quite to the contrary, Inspector Harding (Affidavit, ¶9) specifically refers to the catalog which is attached to his (Inspector Harding's) Affidavit as Exhibit 3. In that Exhibit 3, third page, is the very warning which the Mahoney Affidavit alleges was not included in the search warrant application of Inspector Harding. Furthermore, and more importantly, the Exhibit 3 sets out the various videos and magazines which the defendant ultimately ordered:

<u>TITLE</u>	<u>MEDIA</u>	<u>DESCRIPTION IN CATALOG</u>
Pissing Lolita	Video	This is an absolute sensation! A film which shows you the ultimate pleasure children and adults have in the act of pissing over each other. They try mostly to hit the little cunts. Look at the two Lolita's [sic] of 9 and 10 enjoying it. and see these girls pissing!
Lover Boys #6	Video	Young boy action, featuring boy on boy.

<u>TITLE</u>	<u>MEDIA</u>	<u>DESCRIPTION IN CATALOG</u>
Torid Tots #1	Magazine	Very young girls in all poses. Hard to get material. Sucking and fucking. Black and white.
Children Love #1	Magazine	Preteen, hairless pussies being sucked, fingered and fucked. Black and white.

- e) Mahoney, ¶¶ 18 & 19 make allegations that the Government's "entrapment scheme" was not fully made known to the Magistrate. As discussed in the preceding paragraph, the Government categorically denies this. However, the entrapment claim of the defendant may be fully argued by the defendant to a jury.
- f) Mahoney, ¶ 22 alleges that there was no factual basis to conclude that the video tape of "Pissing Lolita" was actually taken to the defendant's residence -- which was the subject of the search. However, Inspector Harding categorically stated that the defendant picked up the video at the Post Office, put it in his car, drove to his residence and entered his residence "with a black zipper bag" (Harding Affidavit ¶19). It is submitted that since this all occurred in a period between 3:24 p.m. and 3:35 p.m., that there was probable cause to believe that Mr. Maday, in fact, brought this video tape into his home at that time.

- g) Mahoney, ¶¶23-27 essentially allege that the Government failed to allege the exact contents of other materials to be seized and failed to set any basis to show that those other items had been mailed, transported or shipped in interstate commerce. Once again, the Harding Affidavit read in its totality, shows that the defendant had, in fact, engaged in mailings to obtain and/or to correspond about children and sexual activity. Furthermore, as noted earlier, the other materials involving both child and adult pornography were to be seized to show defendant's scienter.
- h) Mahoney, ¶¶28-29 state that the Warrant fails to particularly describe that which is to be seized and that certain materials were "presumptively protected". As will be argued in the Government's Memorandum of Law, child pornography is not "presumptively protected" although adult pornography is. Nonetheless, Inspector Harding's Affidavit established that there was probable cause to believe the defendant was in possession of child pornography

in particular and flowing from that fact is that the defendant would possess sexually explicit material in general. While the defendant might have a right to possess adult pornography in his home under Stanley v. Georgia, 394 U.S. 557 (1969), such right does not prohibit the Government from seizing such adult pornography in order to allow the Government to sustain its burden to prove defendant's scienter. The Government does not contend that the defendant might not have a right to have the adult pornography returned to him once the indictment and trial process is concluded.

- i) Mahoney, ¶¶30-32 allege that the Warrant was overly broad. As noted earlier, the Government was not only looking for evidence of defendant's actual mailings or dealings in interstate commerce of child pornography, but the Government was also looking for other "evidence, fruits or instrumentalities" -- direct or circumstantial -- which would tend to show defendant's scienter in committing that crime. That scienter would thereby logically include "other sexually explicit materials" (books, magazines, films, etc.), envelopes, correspondence, address books, mailing lists, advertising brochures and those

items used to view videos and films (photographic equipment). While there might well be First Amendment protection prohibiting independent prosecution for some of those items, the Government is still entitled to obtain and use them as evidence of the defendant's intent (scienter).

- j) Mahoney, ¶¶33-34 & ¶38 allege that the law enforcement officials were required to stop their search once the specific video tape which is the subject of the Indictment was located by investigators. This conclusion of Mr. Mahoney has no basis since the Search Warrant authorized a search that went beyond the single video tape involved in this Indictment.
- k) Mahoney, ¶35 makes allegations relative to some seemingly innocent items which were seized. However, the television and video cassette recorder are clearly items which could be used to view the video cassette which is the subject of this Indictment and other video cassettes which the defendant possessed. Furthermore, the other video tapes with seemingly innocent titles ("National Geographic: History of Space", etc.) were seized in order to allow for a

careful review as to whether they contained child porn or sexually explicit material. Once reviewed and once determined to be nonpornographic, all such video tapes were returned to the defendant.

- h) Mahoney, ¶40 correctly alleges that Postal inspectors photographed and video taped the search. These will be made available to the Court, if the Court deems it necessary.

14. It is respectfully submitted to the Court that there was ample probable cause for the Search Warrant which the Magistrate authorized; that the investigators executed the search entirely within the borders of that Search Warrant; and that the investigators reasonably relied upon that Search Warrant during its execution, even if the Court now finds that parts of that Search Warrant were defective.

15. It is submitted that the Court's determination as to the validity of the Warrant (whether in whole or in part) must be determined on the four corners of the document which was before the Magistrate and that such review by this Court must give great deference to the findings of the Magistrate (see Memorandum of Law submitted by the Government).

16. The Government acknowledges that the Court may conduct a hearing as to the execution of the Warrant and whether the investigators went outside the scope of that Warrant.

17. Finally, any portions of the Search Warrant which are found defective and items seized based thereon should not be suppressed since the investigators reasonably relied upon the Search Warrant under the dictates of U.S. v. Leon, 468 U.S. 897 (1984), as argued more fully in the Government's Memorandum of Law.

WHEREFORE, it is respectfully requested that the Court deny the suppression of the evidence seized by the Government from the defendant's residence.



MARTIN J. LITTLEFIELD
Assistant United States Attorney

Sworn to before
me this 17th day of
May, 1988.

Jean L. Wylucki

JEAN L. WYLUCKI
Notary Public, State of New York
Qualified in Niagara County
Commission Expires
5/31/88

SEARCH WARRANT ON WRITTEN AFFIDAVIT

COMPLETE COPY OF ORIGINAL (3/88)
WARRANT

D

United States District Court		DISTRICT Western District of New York	
UNITED STATES OF AMERICA v.		DOCKET NO. 87	MAGISTRATE'S CASE NO. 102M
A white brick and wooden frame structure consisting of three floor levels. The structure and its location are known as 5 Brittany Lane, Buffalo, NY 14222.		TO: Any United States Postal Inspector or other authorized Federal Law Enforcement Agent.	

Affidavit(s) having been made before me by the below-named affiant that he/she has reason to believe that (on the person of) (on the premises known as) 5 Brittany Lane, Buffalo, NY 14222, consisting of a three floor level white brick and wooden frame structure which is occupied and controlled by David C. Maday. The ground floor contains an entrance door as well as a garage door entrance Both doors contain the numeral "5" and name plates.

in the Western District of New York there is now being concealed certain property, namely evidence, fruits, and instrumentalities of violations of 18 U.S.C. Section 2252(a) (1) and Section 2252(a) (2), including in particular various books, magazines, photographs, films, and video tapes depicting minors engaged in sexually explicit conduct as those terms are defined in 18 U.S.C. Section 2256 (hereinafter "child pornography") whether produced in the United States or abroad; magazines and films depicting child pornography and other sexually explicit materials; envelopes, letters, and other correspondence constituting orders to buy or offers to sell or trade such child pornography and other sexually explicit materials, documents and records of any kind reflecting the making or receipt, or acknowledgement, shipping, billing or payments of orders to purchase or offers to sell child pornography and other sexually explicit materials; address books, mailing lists, supplier lists, mailing address labels, advertising brochures or materials, films, photocopiers, projectors, typewriters, and all documents or records pertaining to the preparation, purchase or acquisition of customer names or lists, used in conjunction with the purchase or sale of child pornography and other sexually explicit materials; records of purchase of still, motion picture and video photography equipment, film or developing services, and all other records relating to the producing, sale, or purchase of child pornography and other sexually explicit materials; photographic equipment used in the taking, processing, development or duplication of films.

FILED
87 JUN 25 AM 10:2
U.S. DISTRICT COURT
WESTERN DISTRICT OF
BUFFALO

and as I am satisfied that there is probable cause to believe that the property so described is being concealed on the person or premises above-described and the grounds for application for issuance of the search warrant exist as stated in the supporting affidavit(s),

YOU ARE HEREBY COMMANDED to search on or before of JUNE 20th 1987 (not to exceed 10 days) the person or place named above for the property specified, serving this warrant and making the search (in the daytime — 6:00 A.M. to 10:00 P.M.) (at any time in the day or night)* and if the property be found there to seize it, leaving a copy of this warrant and receipt for the property taken, and prepare a written inventory of the property seized and promptly return this warrant to ME as required by law. Federal Judge or U.S. Magistrate

NAME OF AFFIANT R.B. Harding U. S. Postal Inspector	SIGNATURE OF JUDGE OR U.S. MAGISTRATE <i>Edmund J. Murphy</i>	DATE/TIME ISSUED 6/19/87, 11:52
---	--	------------------------------------

AFFIDAVIT FOR SEARCH WARRANT

COMPLETE COPY OF ORIGINAL (3/88)
SEARCH WRT + EXHIBITS
(from Magistrate)

10

United States District Court		DISTRICT Western District of New York	
United States of America vs. A white brick and wooden frame structure consisting of three floor levels. The structure and its location are known as 5 Brittany Lane, Buffalo, NY 14222.		DOCKET NO. <div style="text-align: center; font-size: 1.5em;">87</div>	MAGISTRATE'S CASE NO. <div style="text-align: center; font-size: 1.5em;">102M</div>
		NAME AND ADDRESS OF JUDGE ¹ OR U.S. MAGISTRATE Honorable Edmund F. Maxwell 414 United States Courthouse Buffalo, NY 14202	
The undersigned being duly sworn deposes and says: That there is reason to believe that			
<input type="checkbox"/> on the person of <input checked="" type="checkbox"/> on the premises known as		DISTRICT Western District of New York	
5 Brittany Lane, Buffalo, NY 14222 is a three floor residential white brick and wooden frame structure on the East side of the Lane. The ground floor contains an entrance door as well as a garage door entrance. Both doors contain the numeral "5" and name plates. The entrance door name plate reads "David C. Maday" and the garage door name plate reads "Dave Maday".			
The following property (or person) is concealed:			
See attached affidavit.			
Affiant alleges the following grounds for search and seizure ² :			
<input checked="" type="checkbox"/> See attached affidavit which is incorporated as part of this affidavit for search warrant			
Affiant states the following facts establishing the foregoing grounds for issuance of a Search Warrant:			
See attached affidavit.			
SIGNATURE OF AFFIANT <div style="font-size: 1.5em; font-family: cursive;">Roger B. Harding</div>		OFFICIAL TITLE, IF ANY <div style="font-size: 1.5em; font-family: cursive;">U.S. POSTAL INSPECTOR</div>	
Sworn to before me, and subscribed in my presence: DATE <div style="font-size: 1.5em; font-family: cursive;">6/19/87 11:51 AM</div>		JUDGE OR US MAGISTRATE <div style="font-size: 1.5em; font-family: cursive;">[Signature]</div>	

FILED
87 JUN 19 PM 3:26
U.S. DISTRICT COURT
W.D.N.Y. - BUFFALO

¹United States Judge or Judge of a State Court of Record.

²If a search is to be authorized "at any time in the day or night" pursuant to Federal Rules of Criminal Procedure 41(c), show reasonable cause therefor.

EXHIBIT 'A'

AFFIDAVIT IN SUPPORT OF APPLICATION
FOR SEARCH WARRANT

STATE OF NEW YORK)
)
COUNTY OF ERIE) SS:

RALPH B. HARDING, United States Postal Inspector, United States Postal Inspection Service, being duly sworn, deposes and states:

1) Affiant has been a U.S. Postal Inspector for the past 17 years and is presently assigned to the Buffalo, NY Division of the U.S. Postal Inspection Service. As part of my duties as a Fraud Specialist of the Fraud & Prohibited Mailings Section of the Division, I am responsible for the investigations of the illegal use of the U.S. Mails for prohibited purposes, including the mailing of material involving sexual exploitation of children. As a result of the aforementioned duties, your deponent has had the occasion to become directly involved in investigations relating to the sexual exploitation of children, to observe and review extensive examples of child pornography in film, inquiries, photographs and other print media. Your deponent also has had the occasion to discuss and review these materials with pediatricians, and has received instruction wherein the subject of classifying or identifying the age of photographic models or actions in pornographic materials has been presented. This affidavit is made in support of an application for a search warrant to search the residence of DAVID C. MADAY.

2) Affiant believes that presently located on or within these premises are evidence, fruits, and instrumentalities of violations of 18 U.S.C. §2252(a)(1) and §2252(a)(2), including in particular various books, magazines, photographs, films, and video tapes depicting minors engaged in sexually explicit conduct (hereinafter "child pornography") as those terms are defined in 18 U.S.C. §2256 whether produced in the United

States or abroad; magazines and films depicting child pornography and other sexually explicit materials, envelopes, letters, and other correspondence constituting orders to buy or offers to sell or trade such child pornography and other sexually explicit materials, documents and records of any kind reflecting the making of receipt, or acknowledgement, shipping, billing or payments of orders to purchase or offers to sell child pornography and other sexually explicit materials, address books, mailing lists, supplier lists, mailing address labels, advertising brochures or materials, films, photocopiers, projectors, typewriters, and all documents or records pertaining to the preparation, purchase or acquisition of customer names or lists, used in connection with the purchase or sale of child pornography and other sexually explicit materials; records of purchase of still, motion picture and video pornography equipment, film or developing services, and all other records relating to the producing, sale, or purchase of child pornography and other sexually explicit materials; all photographic equipment used in the taking, processing, development or duplication of films.

3) Affiant's belief is based upon the following paragraphs, 3(a) through 19:

- (a) Title 18, United States Code, §2252(a)(1) prohibits mailing any visual depiction if the producing of such visual depiction involves the use of a minor engaging in sexually explicit conduct, and such visual depiction is of such conduct;
- (b) Title 18, United States Code, §2252(a)(2) prohibits the knowing receipt of any visual depiction through the mails if the producing of such visual depiction involves the use of a minor engaging in sexually explicit conduct, and such visual depiction is of such conduct;
- (c) Title 18, United States Code, §2256 defines, for the purposes of §2252, the term:

- (1) "Minor" means any person under the age of 18 years;
- (2) "Sexually Explicit Conduct" means actual or simulated:
 - (A) Sexual intercourse, including genital-genital, oral-genital, anal-genital, oral-anal, whether between persons of the same or opposite sex;
 - (C) Masturbation; or
 - (E) Lascivious exhibition of the genitals or pubic area of any person.
- (3) "Producing" means producing directing, manufacturing, issuing, publishing or advertising.

4) The U.S. Postal Inspection Service, since June of 1984, has been engaged in several ongoing undercover programs in an attempt to isolate and identify active pedophiles throughout the United States. These programs include the use of underground identities. Based on these programs, certain individuals are identified as possible child pornography suspects. During the course of this investigation into the activities of DAVID C. MADAY, an underground publication was utilized which is described as follows:

Far Eastern Trading Co., Ltd. of Hong Kong (hereinafter referred to as "Far East") - This particular undercover program was developed as an undercover mail order company which deals in the sale and purchase of child pornography. The company is supposedly located in Hong Kong, China with a branch office located at P.O. Box 3071, Frederiksted, St. Croix, Virgin Islands 00840. This particular P.O. Box is, in actuality, under the control of U.S. Postal Inspector Raymond Mack of the Newark Division of the U.S. Postal Inspection Service. During early 1986, Inspector R. Mack directed the mailing of a letter to child pornography suspects located within the Continental United States. This letter, drawn on a "Far East" letterhead was enclosed in an envelope with cancelled Hong Kong, China postage affixed. A copy of this letter is listed as Exhibit 1. The letter advised the recipient the extensive coverage given by

the American media to the subject of pornography is hysterical nonsense. It further advised the reader the U.S. Customs Service is engaged in an exercise in international censorship by directing their agents to find "child pornography" and seize the "product". The letter advises the recipient the company has devised a system of offering "youthful material", from well known publishers, without having the "prying eyes of U.S. Customs" seizing their mail. The letter advises the recipient if they would like further information to complete a "coupon" which requires the recipient's name and address. It further requires the recipient to sign a disclaimer form which indicates the recipient is 21 years of age and is not acting as a law enforcement officer or agent of the U.S. Government.

5) During the course of this investigation, Inspector Raymond C. Smith, currently assigned to the Washington, D.C. Division of the U.S. Postal Inspection Service, assumed an undercover identity (hereinafter referred to as "Inspector Smith's test name"), to correspond with David C. Maday, 5 Brittany Lane, Buffalo, NY 14222. (The undercover identity is not disclosed at this time, due to other criminal investigations still ongoing.)

6) Independent from Far East correspondence, on or about August 30, 1984, Inspector R.C. Smith wrote a letter to David Maday utilizing an undercover test name. The letter was placed in an envelope addressed to David Maday, 5 Brittany Lane, Buffalo, NY 14222 and placed in the U.S. mails on September 6, 1984. Inspector Smith indicated in his letter "I'm just getting into photography, in particular the 'Back to Nature' look and prefer innocent types for my subject matter. I enjoy collecting materails (VHS tapes, 8mm films, photos and mags) depicting these beauties during various stages of 'Development'". Further, Inspector Smith inquires of Mr. Maday, if Mr. Maday has similar interests. On or about September 25, 1984, Mr. Maday responds (return address being 5 Brittany Lane, Buffalo, NY 14222 and addressed to Inspector R.C. Smith's test name) to Inspector R.C. Smith's letter and states "The possibility

does exist that we may share the same experiences in common". On or about February 1, 1985, Inspector Smith and on or about December 15, 1986, the affiant had placed in the U.S. mails, letter responses to Mr. Maday's letter of September 25, 1984. Mr. Maday has not yet responded to the February 1, 1985 and December 15, 1986 letters of Inspector Smith and the affiant.

7) Investigation of the activities of David C. Maday disclosed the following information:

- (A) On or about February 21, 1984, Mr. Maday was notified by U.S. Customs of a seizure of illustrated advertising depicting child pornography entitled "Film Video Index", which contains photos of children in sexually explicit poses. This advertising was addressed to David Maday, 5 Brittany Lane, Buffalo, NY 14222. This advertising was mailed from a country of foreign origin and was seized by U.S. Customs upon entry into the United States under Customs seizure #01410/026 on 2/21/84.
- (B) On or about March 5, 1984, Mr. Maday was notified by U.S. Customs of a seizure of a child pornography magazine entitled "Kuddels Frunde #1", which contains photos of children in sexually explicit poses. This magazine was addressed to Dave Maday, 5 Brittany Lane, Buffalo, NY 14222. This magazines was mailed from a country of foreign origin and was seized by U.S. Customs upon entry into the United States under Customs seizure #01533/004 on 3/5/84.
- (C) On or about April 2, 1984, Mr. Maday was notified by U.S. Customs of a seizure of a child pornography magazine entitled "Joyboy #30", which contains photos of children in sexually explicit poses. This magazine was addressed to Dave Maday, 5 Brittany Lane, Buffalo, NY 14222. This magazine was mailed from a country of foreign origin and was seized by U.S. Customs upon entry into the United States under Customs seizure #01807/035 on 4/2/84.

- (D) On or about April 2, 1984, Mr. Maday was notified by U.S. Customs of a seizure of two child pornography magazines entitled "Kuddles Freunde" and "Superboy #31", which contains photos of children in sexually explicit poses. The magazines were addressed to Mr. Dave Maday, 5 Brittany Lane, Buffalo, NY 14222. The magazines were mailed from a country of foreign origin and were seized by U.S. Customs upon entry into the United States under Customs seizure #01807/039 on 4/2/84.
- (E) On or about August 6, 1984, Mr. Maday was notified by U.S. Customs of a seizure of illustrated advertizing depicting child pornography which contains photos of children in sexually explicit poses. This advertising was addressed to Mr. Dave Maday, 5 Brittany Lane, Buffalo, NY 14222. This advertising was mailed from a country of foreign origin and was seized by U.S. Customs upon entry into the United States under Customs seizure #03271/007 on 8/6/84.
- (F) On or about December 24, 1984, Mr. Maday was notified by U.S. Customs of a seizure of illustrated advertising depicting child pornography. This advertising was addressed to Dave Maday, 5 Brittany Lane, Buffalo, NY 14222. This advertising was mailed from a country of foreign origin and was seized by U.S. Customs upon entry into the United States under Customs seizure #00915/019 on 12/24/84.

8) Reference is made to paragraph 4 of this affidavit which relates to the "Far East" undercover operation. Specific reference is made to the "disclaimer" form which must be returned by the recipient of the letter. Sometime after May 28, 1986, Postal Inspector Ray Mack, Newark, NJ, received a disclaimer signed by David Maday, dated May 28, 1986. This disclaimer was received by U.S. mail in an envelope which bore the return address of "Mr. David C. Maday, 5 Brittany Lane, Buffalo, NY 14222. A copy of Mr. Maday's disclaimer is listed as Exhibit 2.

9) On or about December 18, 1986, a mailing was made by "Far East" to Mr. David Maday, 5 Brittany Lane, Buffalo, NY 14222. This letter (Exhibit 3) was printed and enclosed in a envelope with cancelled U.S. postage affixed. The cancellation mark indicated the letter had been mailed in the Virgin Islands. This letter advised the recipient he may sell the Far Eastern Company any photos, video tapes or stories related to child pornography. The letter also contained a brochure which listed child pornography items which were offered for sale by Far Eastern Trading Co., Ltd. On or about January 12, 1987, Postal Inspector Ray Mack, Newark, NJ received a letter addressed to "Far Eastern Trading Ltd., Post Office Box 3071, Frederiksted, St. Croix, U.S. Virgin Islands 00840 which contained an order from David Maday for two video cassettes and two magazines depicting child pornography. The order was received in an envelope which bore the return address "David Maday, 5 Brittany Lane, Buffalo, NY 14222. A copy of Mr. Maday's order is listed as Exhibit 4.

10) On or about April 14, 1987, a mailing was made by "Far East" to Mr. David Maday, 5 Brittany Lane, Buffalo, NY 14222. This letter was printed and enclosed in an envelope with cancelled U.S. postage affixed. The cancellation mark indicated the letter had been mailed in the Virgin Islands. This letter advises the recipient it is in response to the delays and inquiries relating to the lack of filling orders in a timely manner. Further, the letter advised the recipient he will be receiving a new catalog offering "some of our old and new merchandise". An explanation is offered that the new catalog has resulted based on circumstances beyond the company's control. A copy of the letter is listed as Exhibit 5.

11) On May 12, 1987, Mr. J.E. Guido, Letter Carrier, Route 2204 was interviewed by Postal Inspector E.B. Zambarda, Jr. at the Westside Station of the Buffalo, NY Post Office. Mr. Guido stated Mr. David Maday receives mail at 5 Brittany Lane, Buffalo, NY 14222.

12) On May 12, 1987, Inspector E.B. Zambarda, Jr. observed 5 Brittany Lane, Buffalo, NY 14222, the address at which Mr. Maday is receiving his mail, and which also is described to be the residence of Mr. Maday. Inspector Zambarda described the residence as follows:

5 Brittany Lane, Buffalo, NY 14222 is a three floor residential white brick and frame structure on the east side of the Lane. The ground floor contains an exterior door, as well as a garage door entrance. Both doors contain the numeral "5" and name plates. The entrance door name plate reads "David C. Maday" and the garage door name plate reads "Dave Maday". Brittany Lane is a dead-end, that runs in a south to north direction and is perpendicular to West Ferry Street. Brittany Lane is bounded by Cleveland Avenue on its north, West Ferry Street on its south, Delaware Avenue on its east and Elmwood Avenue on its west.

13) Surveillance of 5 Brittany Lane, Buffalo, NY 14222 by Postal Inspector E.B. Zambarda, Jr. has revealed the following:

On May 26, 1987 at 7:44 AM and on May 29, 1987 at 8:16 AM, a white male, 40 to 45 years of age, with his weight being over 200 lbs., exited the residence and entered a late model, maroon, 4-door Chevrolet bearing New York State License Plate IWS 391. The vehicle was then driven to Joseph Malecki, Inc., 2320 Clinton Avenue, Cheektowaga, NY. Polks-Buffalo-City Directory 1986 shows David C. Maday to be an employee of Joseph Malecki, Inc.

A drivers license check with the New York State Department of Motor Vehicles determined that David C. Maday resides at 5 Brittany Lane, Buffalo, NY 14221, and has a date of birth of June 30, 1947 and has a current height of 6 feet 3 inches. A check of New York State License Plate IWS 391 disclosed that the automobile driven by Maday is a leased vehicle.

14) All video tapes and magazines described in the catalog and offered for sale by Far Eastern Trading have been reviewed by a pediatrician in the Washington, DC area. According to the pediatrician, whose expertise is in adolescent development, the children depicted in the visual depictions are under the age of 18 years.

15) All items offered by Far Eastern Trading have been reproduced by the Inspection Service under controlled situations from items seized or purchased during Inspection Service investigations.

16) On June 10, 1987, a postcard mailing was made by "Far East" to Mr. David Maday, 5 Brittany Lane, Buffalo, NY 14222. This postcard advised Mr. Maday that his order has been received (See Paragraphs 9 and 17) and will be partially filled and mailed by 6/11/87. The order will be sent Special Delivery/COD. The order being shipped is for Video Cassette - KV-330. The cost is \$105.95 (includes postage and handling). A copy of the postcard is listed as Exhibit #6.

17) In response to the order submitted by David Maday (See Paragraph 9) for a video cassette entitled "Pissing Lolita KV-330" which is more specifically described in Exhibit #3. This item has been prepared for delivery to D.C. Maday, 5 Brittany Lane, Buffalo, NY 14222. This item has been initialed for evidentiary purposes. On June 16, 1987, this video cassette was placed in a 10½"x16" mailing envelope with \$5.00 of U.S. Postage affixed and cancelled with a Virgin Islands Postmark. The mailing envelope was addressed to D.C. Maday, 5 Brittany Lane, Buffalo, NY 14222. On June 16, 1987, the above described mailing was sealed which contained the video cassette which contains photographs of children in sexually explicit poses and has been shown to the Court in Camera with the presentation of this affidavit.

18) Your deponent has received training and instructions from experts in the field of investigation of child pornography and pedophiles. These experts, psychologists and other law enforcement officials have found that through research, investigation and experiences, that child pornographers and pedophiles almost always maintain and possess their material (pictures, films, video tapes, magazines, negatives, photographs, correspondence, mailing lists, books, taped recordings, etc.) in their homes or other nearby locations that is secure and concealed but immediately available and accessible to them. Furthermore, the collection of child pornography and other sexually explicit material maintained by these individuals is permanent, and although they may trade certain items for the purpose of expanding their collections, they will never willingly dispose of the entire collection. This behavior has been documented by other Postal Inspectors and by other law enforcement officers involved in the investigation of child pornography throughout this country. Based upon my training and personal experience in child pornography investigations and the letters and materials sent by David C. Maday, David C. Maday fits the profile of a child pornographer and a pedophile.

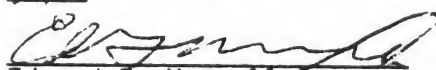
19) On June 16 and 17, 1987, a delivery of the item described in paragraph 17 of this affidavit was attempted. The item could not be delivered as no one was present at the address known as 5 Brittany Lane, Buffalo, NY 14222. The delivery of the C.O.D. parcel, as described in paragraph 15 of this affidavit, requires personal delivery of the article and immediate payment for the article. Based on the aforementioned circumstances, a PS Form 3849A was placed into the mailing door slot of 5 Brittany Lane, Buffalo, NY 14222 which is the authorized mail receptacle for this address. This notice advised David C. Maday of the delivery attempt made and advised him the parcel could be picked up at the West Side Station Post Office located at 465 Grant St., Buffalo, NY 14213 during normal business hours. On June 18, 1987, at approximately 3:24 PM, David C. Maday entered the West Side Station Post Office and purchased the C.O.D. parcel as described in paragraphs 16 and 17 of this

affidavit. Mr. Maday exited the West Side Post Office at approximately 3:30 PM, placed the parcel in the car he was driving and proceeded to his residence, 5 Brittany Lane, Buffalo, NY 14222. Mr. Maday arrived at his residence at approximately 3:35 PM and was observed entering his residence with a black zipper bag. Mr. Maday remained at his residence until approximately 4:00 PM at which time he returned to his car and drove to his place of employment, arriving there at 4:15 PM.

20) Based upon our preliminary investigation and the circumstances as stated in this affidavit it is requested a search warrant be issued for the residence known as 5 Brittany Lane, Buffalo, NY.


RALPH B. HARDING
U.S. Postal Inspector

Sworn to before me this
19 day of June 1987.


Edmund F. Maxwell
U.S. Magistrate

FAR EASTERN TRADING COMPANY LTD

HONG KONG

B.C.C.

Dear Potential Friend:

As many of you know, much hysterical nonsense has appeared in the American media concerning "pornography" and what must be done to stop it from coming across your borders. This brief letter does not allow us to give much comments; however, why is your government spending millions of dollars to exercise international censorship while tons of drugs, which makes yours the world's most crime ridden country are passed through easily. We have read the comments of Mr. Van Rabb of your Customs Service concerning the efforts of his agents to find "children's pornography" and we find that many of you are denied a product because of that agency. After conversation with enlightened Americans, we have found that if material is given to your post without a Custom inspection, a search warrant must be gotten in order to open your mail.

For those of you who have enjoyed youthful material from publishers such as COQ, Color Climax, Rodox and others, we have devised a method of getting these to you without prying eyes of U.S. Customs seizing your mail. All material that you order from your company will be sent to you through our branch office in the Virgin Islands. After consultations with American solicitors, we have been advised that once we have posted our material through your system, it cannot be opened for any inspection without authorization of a judge.

If you want further information, please complete the following coupon and disclaimer and post it to the listed addresses:

NAME _____

ADDRESS _____

I affirm that I am not a law enforcement officer or agent of the U.S. Government acting in an undercover capacity for the purpose of entrapping Far Eastern Trading Company, its agents or customers. I am 21 years of age.

SIGNATURE _____

DATE _____

Please Post To:

Far Eastern Trading-Dept.
Post Office Box 3071
Frederiksted, St. Croix
Virgin Islands 00840

EXHIBIT No. 1

FAR EASTERN TRADING COMPANY LTD

HONG KONG

Dear Potential Friend:

As many of you know, much hysterical nonsense has appeared in the American media concerning "pornography" and what must be done to stop it from coming across your borders. This brief letter does not allow us to give much comments; however, why is your government spending millions of dollars to exercise international censorship while tons of drugs, which makes yours the worlds most crime ridden country are passed through easily. We have read the comments of Mr. Van Rabb of your Customs Service concerning the efforts of his agents to find "children's pornography" and we find that many of you are denied a product because of that agency. After conversation with enlightened Americans, we have found that if material is given to your post without a Custom inspection, a search warrant must be gotten in order to open your mail.

For those of you who have enjoyed youthful material from publishers such as COQ, Color Climax, Rodox and others, we have devised a method of getting these to you without prying eyes of U.S. Customs seizing your mail. All material that you order from our company will be sent to you through our branch office in the U.S. Virgin Islands. After consultations with American solicitors, we have been advised that once we have posted our material through your system, it cannot be opened for any inspection without authorization of a judge.

If you want further information, please complete the following coupon and disclaimer and post it to the listed addresses:

NAME

DAVID C. MADAY

ADDRESS

5 BRITTANY LANE

BUFFALO, NEW YORK 14222

I affirm that I am not a law enforcement officer or agent of the U.S. Government acting in an undercover capacity for the purpose of entrapping Far Eastern Trading Company, its agents or customers. I am 21 years of age.

SIGNATURE



DATE

5/28/86

Please Post To: Far Eastern Trading
Post Office Box 3071
Frederiksted, St. Croix
U.S. Virgin Islands 00840

EXHIBIT No. 2

DAVID C. MAE
5 BRITANY LANE
SUFFALO, N. Y. 14221

Far Eastern Trading
P.O. Box 3071
Frederiksted, St. Croix
U.S. Virgin Islands 00840



Handwritten signature/initials

Dear Friends,

We can only thank you for being patient with us in our attempt to bring you our products. Those of you who have received prior letters from us know that we are publishing our own pictorial magazine EROTIC YOUTH. We have obtained some material from you, our friends, and we are now requesting more. We will purchase camera ready negatives or prints of good quality that demonstrate just how erotic young persons can be. We will purchase prints or negatives. We don't want to present you with photo's that you have seen hundreds of times before. Some of our current models have been used to illustrate our catalogue.

We have received several videotapes showing photographic collections or live action shots that can be reproduced photographically. That is not only an excellent method of sending us a sample, but it has also enabled us to produce one of the films that we have offered to you for sale. The friend who sold us the rights to his video not only received payment from us, but, also entered into a contract with us to obtain a share of royalties.

If you are proficient with the written word, we will also purchase any stories of real life experiences that you have to offer. If photo's are available to illustrate the story, we would consider published your work by itself.

In order to protect you from unwanted difficulties with legal or postal authorities, we have devised the following system for sending us a sample of what you have available.

Send a letter to us stating that you have an item we might be interested in publishing. Do not describe it in any way. Upon receipt of your letter, we will assign you a code number which will be the only means of identifying you or your product. Use no return address, only the code. Therefore, if any mail is intercepted, no one can obtain your identity since our records are not stored in a geographical location that will give information to American authorities. Anyone who supplies us with photo's, tapes and stories will receive the first four issues of EROTIC YOUTH for free.

We hope that you realize that you must be discreet and we promise to do our utmost to protect you. Upon receipt of your letter, we will also send a listing of what we will pay.

Peter Harcourt-Smythe

FOR: Far Eastern Trading LTD
The Crown Colony
Hong Kong

Dear Friends,

After a long delay, our company has been able to present to you the listing of our video's and magazines that are available from our representative in the U.S. Virgin Islands. As you know, these items are difficult to obtain and our supplies are limited to problems with the copyright holders. Therefore, we will fill orders on a priority basis. Priority will be determined based on those who decide to enter into a business relationship with us. Please see our offer accompanying this catalogue.

In order to avoid any problems and to assure you of our integrity, we will post your return order as C.O.D. In other words, we will not take any money from you if we cannot supply the product. I am quite sure that some of you have lost funds that you sent to other companies and I can emphatically state that Far Eastern Trading will not take your money without a sale.

To place an order, please state two choices by title and mail to:

Far Eastern Trading LTD
Post Office Box 3071
Frederiksted, St. Croix
U.S. Virgin Islands 00840

P.S. As we have previously stated, we will be using your postal service in order to avoid any legal problems with the U.S. Custom Service, therefore we cannot use any other delivery system. Do not request delivery by United Parcel, Purolator Courier or Federal Express. We will not use them since they can turn over material for search without due process.

Video only

WONDERBOY
\$185.00

JOY BOY SPECIAL 1 & 2
\$190.00

Deals with the love of youth, in all respects, openly and directly. It will in any man awake the sweet memories of the time when sex was a sweet joy, free of taboos.

behandelt die Liebe zu Jungen auf vielen gebieten und in offener, direkter Weise. Es wird in jedem Mann schöne Erinnerungen an jene Zeit erwecken, in der man Sex einfach so betrieb - Frei und ohne Hemmungen.

King Size with glitter cover! Once again we have captured a row of joyous youngsters in hot action.

reisenformat mit Hochglanzumschlag! Unsere Fotografen haben wieder eine Reihe von Jungens aufs Korn genommen, die sich miteinander den Sex-Freuden hingeben.

SCHWARZE BOYS
\$190.00

Black teen action.

GOLDEN BOYS SERIES
Vols. 9, 10, 11, 12, 14, 15
\$210.00 per

Hot action, j/o, fisting, blonde blue-eyed action.

MAGAZINES

WONDER BOY
Nos. 1 to 10
\$35.00

CHILE BOYS
\$25.00

EROTIC BOYS
Nos. 1 and 2
\$40.00

Teen on Teen.

South American Action Teens.

All Color Action.



FAREASTERN



TRADING CO. LTD.

WARNING

All of the material described in the following pages is sold by Far Eastern Trading Co. Ltd., for educational purposes only. There are no visual depictions of any person under the age of eighteen (18) and any sale of this material will only be to those who have filed a written disclaimer with the company indicating that they are not employed or acting as an agent of any municipal, county, state or federal agency.

All material sold through this catalogue is protected by Worldwide copy rights and cannot be reproduced without authorization.

LUSCIOUS LITTLE LOLITA'S

Supereight mm films - also in video format - PHL & VHS only.

SUCKING DAD
\$129.95



SUCKING DADDY: This lovely 10 year old Lolita is dreaming on the couch when her Dad enters. He sits down and starts to play with her little and hairless cunt. This eventually gets her so hot that she starts to feel his cock which he has taken out. It all develops into a beautiful scene with the young daughter sucking her daddies cock in a wonderful way.

Diese schone 10 Jahrige Lolita traumt in die Simmer als ihre Vater reinkommt. Diese fangt an mit ihre suse kleine und unbehaart Votze zu spielen und das macht ihr so Geil das sie seine Schwanz greift. Es kommt zu eine sehr aufregende scene wobei das liebe Madchen die grosse Schwanz ihre Vater leckt!

PISSING LOLITA
\$99.95

This is an absolute sensation! A film which shows you the ultimate pleasure children and adults have in the act of pissing over each other. They try mostly to hit the little cunts. Look at the two lolita's of nine and ten enjoying it. and see these girls pissing!

Diese Film ist eine sensation! Viele Kinder und Erwachsenen zeichnen uns das genugen uber einander zu uranieren. Heisse Strahlen auf kleine Votze und die 9 und 10 Jahrige Madchen lieben es!

FAMILY SEX
\$149.95

Many things have been written about sex in the family, but never before was there a film which actually showed it all in such an exciting way! You see everything you can do with a family of a father, a beautiful mother and a very hot 10 year old daughter. This is trio-sex familystyle like you've never seen before.

Viel ist gesprochen uber Sex in der Familien. aber noch niemals ist es so schon und aufregend gazeigt! Welche moglichkeiten da sind swischen ein Vater, ein schone Multi und eine heisse 10 Jahrigen Tochter sehen sie in diese specialen Film. Das ist Trio Sex in der Familien die sie noch nie gesehen hat.

TINY WEENIE'S

Videos and Super 8mm

LOVER BOY'S
Nos. 1 to 12
\$175.00 per film
Set - \$1,500

Young boy action, featuring boy on boy.

FRANK & JOE
\$185.00

All little boy action.

BOY'S IN NATURE

Outdoor action, all hairless.

MAGAZINES

LIFEROYS
Nos. 1-10
\$35.00 per issue no sets

Beautiful boys of all ages

PICCOLO BOYS
Nos. 1-38
\$35.00 per issue

The best of boy action.

BOY Nos. 31-41
\$35.00 per issue

Hard to get.

LOTTI POPS
Nos. 2 & 3
\$45.00 per issue

Very young action.



LESBIAN LOLITA'S



LOVELY TEENS

13-year old Karin grabs every chance she gets to play with her 11-year old girlfriends delightful body. Both of them are well developed for their age and what's more, both of them are extremely randy. You'll be quite shocked when you see how the two girls work on each others hairless cunts, using both fingers and their tightly little tongues. Overcome with excitement and randiness, they fuck each other with an enormous vibrator.

Die 13-jährige Karin benutzt jede Gelegenheit, um es mit ihrer 11-jährigen Freundin zu treiben. Beide haben schon ziemlich reife Körper und sind enorm geil. Es ist ein fesselnder Anblick, wie die beiden sich gegenseitig das Fotzchen mit Fingern und Zunge liebkosen. Von ihrer Geilheit überwältigt, ficken sie sich schliesslich gegenseitig mit einem riesigen Vibrator.

VIRGIN MASTURBATION

This film is simply a sensation for all Lolita-fans. Virgin Lola is only 13 years old, but she has already discovered how one satisfied oneself. With fingers, ball point pens and candles she works her own little virgin cunt until her body is shaken violently by series of orgasms.

Dieser Film ist einfach eine Sensation für alle Lolita-Fans. Jungfrau Lola ist nur 13 Jahre alt, hat aber schon entdeckt, wie man sich selber befriedigt. Mit den Fingern, dem Kugelschreiber und Stearinlich verarbeitet sie ihre kleine Jungfrauulich Votze, bis ihr Körper von einem Serie Orgasmen durchzittert wird.

FUCKING CHILDREN

Lilli is only 14 years old but in spite of her age, already extremely randy.

Two boys are licking her had, young tits and then the game starts!

They are sucking her like professionals until the juices are floating from her teenage cunt!

A top class film with some exiting randy close-ups.

Lilli ist erst 14 Jahre alt, aber schon unheimlich geil. Swir Jungens lecken lillis feste kleine Brüste und dann geht's los. Wie erfahrende ficker, bearbeiten sie das kleine Votzchen bis ihre geilen Saft aus dem leelinen Lochlein von der glerigen Zunge des Jungen ausgesaut werden.

Ein Scharfer Film mit unglaublichen Mahaufnahmen.

TEEN SEX VIDEO - BOY SPENNA ORGIES

Sweet, slim Susie has brought her friend as well as her brother to bed. She handles their stiff pricks and rose assholes. A fair ride and lots of semen is her reward. Blonde, voluptuous Hanne enjoys to be stomped through and have the cum of her handsome, brown holiday-friend poured over her naked body.

Die susse, schlanke Susie hat sowohl ihren Freund wie auch ihren Bruder in das Bett gezogen. Sie behandelt die steifen Latten und viel rosa Arschlocher. Eine Ficktour und viel Samen ist ihr Lohn. Die blonde, upplige Hanne wird von ihrem braunen, flotten Ferienfreund durchgestossen und mit Teen-Sperma übergossen.

Four (1) Ironhard, trembling randy youngsters approach a juicy cunt. They caress, masturbate and screw each other when not taking turns licking the fanny or rubbing their jokers between Hannes lips. Uninterrupted hard-ons till one after another lays his fresh cum on the chick.

Vier (1) stocksteife, zitternd geile und strahlend schöne Burschen kreisen um eine zünftige Votze. Die Boys streicheln, masturbieren und ficken einander und wechseln sich ab beim Votzelecken oder mit den Geillstangen zwischen Hannes Lippen. Pausenlose Stander, bis der eine nach dem anderen seinen Boyschmant sprudelt.

That's what they want! Slim, sensitive Linda is plugged by her brother with a tool which she won't forget soon. Blonde Molly enjoys the giant fuckpole of her schoolmate Dennis in hand, mouth and fanny.

TEEN SEX VIDEO - MONSTERCOCKS FOR THE CHICKS

MAGAZINES

TORRID TOTS
Vols. 1, 2 and 3
\$10.00 each magazine

CHILDREN LOVE
No's 1 to 24
\$12.00 each

SCHOOLGIRLS
Vols. 1 through 9
\$25.00 per issue
\$140.00 per set.

LOLITA COLOR SPECIAL ISSUES
8, 9, 12, 13 and 14
\$30.00 per issue

DOLLS ISSUE
1, 2 and 3
\$35.00 per issue

Very young girls in all poses. Hard to get material. Sucking and fucking. Black and White.

Preteen, hairless pussies being sucked, fingered and fucked. Black & White.

PRETEEN TRIO
\$119.95

LOLITA'S SEX LESSON
\$119.95

CHILDREN SEX ORGY
\$129.95

Das wunschen sie sich! Die schlanke, gefuehlvolle Linda kriegt von ihrem Bruder einen Hammer, den sie nicht bald wieder vergisst. Die blonde Molly genießt in Hand, Mund und Mose den Riesenficker ihres Schulfreundes Dennis. Vorn vorn und hinten!

At long last a Lolita movie full of real action! And what kind of action. Two brothers of 12 and 15 are busy fuckin' their little and lovely sister of 9 years old in every possible way and she loves it! She sucks while she is being fucked and at last she licks away the sperm from the cock of her older brother. You will find no other film like this. It is marvelous?

Endlich ein Lolita Film mit echte scharfen Aktion! Zwei Bruder von 12 und 15 ticken mit ihren kleine Schwester von 9 Jahren und auf jedem Art! Das kleine Madchen liebt alles. Sie saugt und leckt auch noch das Sperma von die Schwanz ihre Eltesten Bruder. Da ist kein andere Film wie diese! Es ist herrlich.

A young niece has sex with her uncle. She plays with his hard dick and he comes. - He fingers her forbidden little pussy and later comes the moment when it costs her her cherry.

In diesem Spezialfilm sieht die ersten Liebesstunden welche der onkel dem schoner kleinem Madchen gibt. Er zeigt ihr seinen harten Schwanz. O la la, und der ist zum Blasen da! Er fingert ihre kleine underuhrte Votze und nach vielen schonen Momenten kostet sie seinen Saft. Herrlich! Versaumen Sie nicht sich diesen Film anzusehen.

This film shows a children's sex party. Remarkable scenes. Two boys look for the little bald pussies with their fingers and tongues. Ends with a great child sex orgy.

Dieser Film zeigt eine Kinderparty ganz besonderer Art. Die 2 Buben untersuchen die kleinen unbehaarten Votzchen der geller Madchen mit Finger und Zunge. Alles endet schliesslich in einer unglaublichen Kindersexorgie.

David Maday
5 Brittany Lane
Buffalo, New York 14222



Received Under Test Name

JAN 12 1987

R. J. Mack, Postal Inspector

Far Eastern Trading LTD
Post Office Box 3071
Frederiksted, St. Croix
U.S. Virgin Islands 00840



JAN - 7 1987

D.C. Maday
5 Brittany Lane
Buffalo, New York 14222

Order:

Pissing Lolita VHS	99.95
Lover Boys #6 VHS	175.00
Torrid Tots #1	10.00
Children Love #1	12.00

All #1 choices	\$ 296.95
----------------	-----------

EXHIBIT No. 4

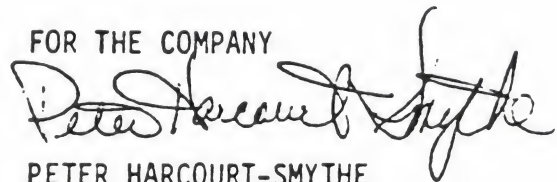
Dear Friends,

This letter is in response to complaints and inquiries that our company has received about our lack of filling orders requested by you, our valued customers. I will give you a short synopsis for what occurred to our merchandise.

Far Eastern entered into a contract with a steam ship company to carry a container aboard one of their vessels leaving Hong Kong in January and arriving at our Caribbean address in mid-February. The ship was to travel through the Panama Canal and it's first stop was to be the Virgin Islands. On February 15, 1987, we were advised that the vessel had deviated from it's original travel route and had stopped in Valparaiso, Chile. The Chilean authorities inspected the cargo and seized our container. We have contacted a Chilean solicitor who advised us that we can probably have our container released after we litigate the matter in their courts. He advised that the process will be slow and could take over a year. Since we have to negotiate with a fascist regime, we feel that his estimate is probably very optimistic.

Please, do not be concerned about your names or addresses being disclosed since no shipping documents or mailing labels were in the container. However, we have secured additional merchandise and you will be receiving a new catalogue offering some of our old and new merchandise. Please, bear with us, this incident and resulting problems have been thrust upon us due to circumstances beyond our control. We at Far Eastern only want to be recognized by you as a reputable company that will conduct business in a professional manner and we want to assure you that we will get your merchandise to you.

FOR THE COMPANY

A handwritten signature in dark ink, appearing to read "Peter Harcourt-Smythe", written over the typed name.

PETER HARCOURT-SMYTHE



D.C. Maday
5 Brittany Lane
Buffalo, NY 14222

Dear Friend,

Your order has been received and will be completely
or partially filled and mailed by 6/11/87.

The order will be sent: Registered Mail, Express
Mail, Special Delivery/COD, Parcel Post

The order being shipped is for ~~the~~ Videocass-
- KV-330.

The cost is \$105.95 (includes postage & handling)

Far Eastern Trading, Ltd.

EXHIBIT No. 6

RETURN

DATE WARRANT RECEIVED

June 19, 1987

DATE AND TIME WARRANT EXECUTED

June 19, 1987 - 2:30 PM

COPY OF WARRANT AND RECEIPT FOR ITEMS LEFT WITH

DAVID MADAY

INVENTORY MADE IN THE PRESENCE OF

R.B. Harding & R.L. Snyder

INVENTORY OF PROPERTY TAKEN PURSUANT TO THE WARRANT

(SEE ATTACHED PLAIN BOND)

6 pages of inventory PLS -

CERTIFICATION

I swear that this inventory is a true and detailed account of all the property taken by me on the warrant.

Ronald J. Snyder
Postal Inspector

Subscribed, sworn to, and returned before me this date.

Ed A. Murphy
Federal Judge or U.S. Magistrate*6/22/87*
Date

EXHIBIT 'B'

1203 PM

Case No. 673-34373-PM(1)

The following items were seized by U.S. Postal Inspectors in the execution of a Search Warrant served upon DAVID MADAY, 5 Brittany Lane, Buffalo, NY 14222 on June 19, 1987:

I. BAR ROOM

Description

SONY Trinitron Color Television (1) with remote control.

Lloyds Video Cassette Recorder, Serial #9824016477

(15) Video Cassetts from shelves entitled as follows:

- 1) Property of D. Maday
- 2) Heageats #3 8/85
- 3) Heageats XXX #1 8/85
- 4) Honeymoovers
- 5) Grand Island Nebraska
- 6) National Geographic "History of Space"
- 7) Honeymoovers
- 8) 2001: A Space Odyssey
- 9) Victory at Sea
- 10) Honeymoovers
- 11) Streetwise
- 12) Body by Garret
- 13) Reefer Madness
- 14) Things to Come
- 15) Godzilla vs. Megalon

One picture of a boy taken from a drawer in the bar.

A quantity of a green leafy substance found in bar drawer.

3 Collages (pictures) taken from wall.

Plastic bags containing a white powdery residue found in ice bucket in bar

3 Hemostats (drawer)

2 Packs of cigarette rolling paper (drawer)

1 Pipe (ice bucket)

1 Box with assorted drug paraphernalia (ice bucket)

RLS
II.

DINING ROOM

Description

1 Photograph from drawer in cabinet

(22) Video cassettes titled as follows taken from cabinet:

- 1) Desert Paradise
- 2) Peep Show
- 3) New Kid in Town
- 4) Jacks are Better
- 5) Super Blue
- 6) The Boys at Duffy Place
- 7) Untitled Tape
- 8) Stars in Your Eyes
- 9) Tyger Tales
- 10) Billcoopers
- 11) VVC-4
- 12) European Classic
- 13) Untitled Tape
- 14) Surf Boys
- 15) Untitled tape cockpit
- 16) Horney Jocks/Mr. Big
- 17) Sticky Business
- 18) Boys Can't Help It
- 19) Hollywood at Large
- 20) Any Where, Any Time
- 21) You Are Alone
- 22) Far Eastern Trading Co. Ltd. Pissing Lolita

RLS

III. UPSTAIRS OFFICE - Typist Table

Description

Smith Corona Typewriter, Electric, Serial No. GN32628

IV. UPSTAIRS OFFICE - Area B Closet

8mm Film Projector "K" - Keystone, Serial No. K6041
Typewriter, Remington, Serial #HY671343

V. UPSTAIRS OFFICE - Area A Closet E-Z

Keystone 8mm Camera, Serial No. 83679
Bar Light for Keystone 8mm Camera (Smith-Victor)
Film Viewer - 8mm, Sears Model 9383
(7) Film Cannisters
Brown Photo Album

VI. UPSTAIRS OFFICE - Area C E-Z File Cabinet

Manila Folder - Contains info on "Brothers/Sisters (Be a friend)"

Manila Folder - Foster Parents

Manila Folder - James Moline - "Be a Friend"

Manila Folder - Nick Sansone - "Be a Friend"

Manila Folder - Mickey Ryckman - (Little Brother)

(1) Large Manila Envelope contains cards, letters and notes.

VII. UPSTAIRS OFFICE - Area E - Desk

(Top Left Drawer) - (11) Manila Folders contain letters and correspondence.

One Book marked "Sex Orgy" Register

(14) audio cassette tapes

Card Index and address book

(1) packet of Polaroid pictures.

VIII. UPSTAIRS OFFICE - Area G-5 - Shelf on Wall

(1) Auto Directory Address Book

(1) Tan Photo Album - With Photos

-3- RLS
6/22

IX. UPSTAIRS OFFICE - Area D-Z Bottom of Gun Cabinet

Approx. 286 mags containing child porno and young males in sexually explicit photos.

(1) packet order blanks for child porno and other pornography.

(1) large black notebook guide containing child porn ads/news articles, magazines.

(18) brown manila envelopes contain nude photos of young males.

(15) Film boxes - some with film relating to child pornography and young males in sexually explicit photos.

RLS

X.

GUEST BEDROOM

Description

From Dresser - one (1) picture with writing "To Dave from Aaron" from upper right drawer.

One (1) notepad, upper left, containing letter signed "love Aaron".

XI. MASTER BEDROOM & WALK-IN CLOSET

Description

From Jewelry Box - white powdery substance in plastic bag.

3 Magazines from Desk:

- 1) Teenager Sex
- 2) Seventeen
- 3) Schul-Machen

Ford Code a Phone Serial #A349M

4 Magazines from night table:

- 1) Where the Boys Are
- 2) White Assed Super Pricks
- 3) Ranger Dan
- 4) Men

CLOSET

4 Magazines from suitcase:

- 1) A Catalog of Personal Effects
- 2) The Snatch Sampler
- 3) Men
- 4) Sexual Dimensions

I. BAR ROOM

Description of Items Held as Evidence

SONY Trinitron Color Television (1) with remote control

Lloyds Video Cassette Recorder, Serial #9824016477

2 Video Cassettes (out of 15 originally seized) from shelves entitled as follows:

- #2) Heageats #3 8/85 (hardcore adult pornography)
- #3) Heageats XXX #1 8/85 (hardcore adult pornography)

A quantity of a green leafy substance found in bar drawer

Plastic bags containing a white powdery residue found in ice bucket in bar

3 Hemostats (drawer)

2 Packs of cigarette rolling paper (drawer)

1 Pipe (ice bucket)

1 Box with assorted drug paraphernalia (ice bucket)

Description of Items Already Returned To Defendant

13 Video cassettes (out of 15 originally seized) from shelves entitled as follows:

- #1) Property of D. Maday
- #4) Honeymoovers
- #5) Grand Island Nebraska
- #6) National Geographic "History of Space"
- #7) Honeymoovers
- #8) 2001: A Space Odyssey
- #9) Victory at Sea
- #10) Honeymoovers
- #11) Streetwise
- #12) Body by Garret
- #13) Reefer Madness
- #14) Things to Come
- #15) Godzilla vs. Megalon

Description of Items to Be Returned to Defendant

One picture of a boy taken from a drawer in the bar

3 Collages (pictures) taken from wall

May 13, 1988/MJL

II. DINING ROOM

Description of Items Held as Evidence

20 Video Cassettes (out of 22 originally seized) titled as follows taken from cabinet:

- #1) Desert Paradise (homosexual acts among young men)
- #2) Peep Show (homosexual acts among young men)
- #3) New Kid in Town (homosexual acts among young men)
- #4) Jacks are Better (homosexual acts among young men)
- #5) Super Blue (homosexual acts among young men)
- #6) The Boys at Duffy Place (homosexual acts among men)
- #8) Stars in Your Eyes (homosexual acts among young men)
- #9) Tyger Tales (homosexual acts among young men)
- #10) Billcoopers (young men masterbating)
- #11) VVC-4 (young men masterbating)
- #12) European Classic (homosexual acts among young men)
- #14) Surf Boys (young men masterbating)
- #15) Untitled tape cockpit (young men masterbating)
- #16) Horney Jocks/Mr. Big (young men masterbating)
- #17) Sticky Business (homosexual acts among young men)
- #18) Boys Can't Help It (homosexual acts among men)
- #19) Hollywood at Large (homosexual acts among young men)
- #20) Any Where, Any Time (homosexual acts among young men)
- #21) You Are Along (young children naked and exposing genitalia)
- #22) Far Eastern Trading Co., Ltd. Pissing Lolita (subject of Indictment)

Description of Items Already Returned To Defendant

2 Video cassettes (out of 22 originally seized) titled as follows taken from cabinet:

- #7) Untitled Tape (no pornography)
- #13) Untitled Tape (no pornography)

Description of Items to Be Returned to Defendant

1 Photograph from drawer in cabinet

May 13, 1988/MJL

III. UPSTAIRS OFFICE - Typist Table

Description of Items Held as Evidence

Smith Caronoa Typewriter, Electric, Serial No. GN32628
(identified as used by defendant in mailing to Far
Eastern Trading Company)

No Items for Return

IV. UPSTAIRS OFFICE - Area B Closet

Description of Items Held as Evidence

8mm Film Projector "K" - Keystone, Serial No. K6041

Description of Items to Be Returned to Defendant

Typewriter, Remington, Serial #HY671343

V. UPSTAIRS OFFICE - Area A Closet E-Z

Description of Items Held as Evidence

Film Viewer - 8mm, Sears Model 9383

Description of Items to Be Returned to Defendant

Keystone 8mm Camera, Serial No. 83679

Bar Light for Keystone 8mm Camera

7 Film Cannisters

Brown Photo Album

May 13, 1988/MJL

VI. UPSTAIRS OFFICE - Area C, E-Z File Cabinet

Description of Items Held As Evidence

Manila Folder - Contains info on "Brothers/Sisters (Be a friend)"

Manila Folder - Foster Parents

Manila Folder - James Moline - "Be a Friend"

Manila Folder - Nick Sansone - "Be a Friend"

Manila Folder - Mickey Ryckman - (Little Brother)

1 Large Manila Envelope contains cards, letters and notes (Customs seizure, also)

No Items for Return

VII. UPSTAIRS OFFICE - Area E - Desk

Description of Items Held As Evidence

(Top Left Drawer) - 10 Manila Folders (out of 11 originally seized) containing various letters and correspondence (involving "Be a Friend" and NAMBLA material and "Far Eastern" catalog, including copy of order made by defendant)

One book marked "Sex Orgy" register

4 Audio cassette tapes (out of 14 originally seized)

Description of Items to Be Returned to Defendant

(Top Left Drawer) - 1 Manila Folder (out of 11 originally seized) marked "letters"

10 Audio cassette tapes (out of 14 originally seized)

Card index and address book

1 Packet of Polaroid pictures

May 13, 1988

VIII. UPSTAIRS OFFICE - Area G-5 - Shelf on Wall

No Items Being Held

Description of Items to Be Returned to Defendant

- 1 Auto Directory address book
- 1 Tan photo album - with photos

May 13, 1988/MJL

IX. UPSTAIRS OFFICE - Area D-Z Bottom of Gun Cabinet

Description of Items Held As Evidence

- Approx. 286 mags containing child porno and young males
in sexually explicit photos
- 1 packet order blanks for child porno and other
pornography
- 1 Large black notebook guide containing child porn
ads/news articles, magazines
- 18 brown manila envelopes contain nude photos of young
males
- 15 film boxes - some with film relating to child
pornography and young males in sexually explicit
photos

No Items for Return

May 13, 1988/MJL

X. GUEST BEDROOM

Description of Items to Be Returned to Defendant

From Dresser - one (1) picture with writing "To Dave
from Aaron" from upper right drawer

One (1) notepad, upper left, containing letter signed
"love Aaron"

No Items Being Held

May 13, 1988/MJL

XI. MASTER BEDROOM & WALK-IN CLOSET

Description of Items Held As Evidence

From Jewelry Box - white powdery substance in plastic bag

3 Magazines from desk:

- 1) Teenager Sex
- 2) Seventeen
- 3) Schul-Machen

4 Magazines from night table:

- 1) Where the Boys Are
- 2) White Assed Super Pricks
- 3) Ranger Dan
- 4) Men

4 Magazines from suitcase found in walk-in closet:

- 1) A Catalog of Personal Effects
- 2) The Snatch Sampler
- 3) Men
- 4) Sexual Dimensions

Description of Items to Be Returned to Defendant

Ford Code a Phone Serial #A349M

May 13, 1988/MJL

CR. No. 88-35-E

United States District Court
FOR THE

WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

vs.

DAVID MADAY,

Defendant.

AFFIDAVIT RE: (I) ITEMS BEING HELD AS
EVIDENCE, RETURNED OR TO BE RETURNED
TO DEFENDANT (II) RESPONSE TO THE
SPECIFIC ALLEGATIONS IN DEFENDANT'S
MOTION TO SUPPRESS

ROGER P. WILLIAMS
United States Attorney
MARTIN J. LITTLEFIELD
Assistant U.S. Attorney, Of Counsel

UNITED STATES ATTORNEY

WESTERN DISTRICT OF NEW YORK

UNITED STATES COURT HOUSE

BUFFALO, NEW YORK 14202

Filed _____, 19____

_____, Clerk.

By _____, Deputy.

FILED
88 MAY 19 PM 4:40
U.S. DISTRICT COURT
W.D.N.Y.-BUFFALO